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So ordered
1/10/11
Alvin K. Hellerstein

January 10, 2011

Honorable Alvin K. Hellerstein
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: World Trade Center, 21MC102 (AKH) and 21MC103 (AKH)
Request for partial extension for compliance with Order dated December 22, 2010

Dear Judge Hellerstein

In a recent order of December 22, 2010, you have directed that our office, by January 14, 2011, provide 21MC102 (AKH) defense liaison with the following information, and we have confirmed with defense liaison this is the information they require: updated client building/hours spreadsheet, all medicals for each client and employment verification.

We are pleased to advise that we have provided in CD format all of the above information for all of our clients in the 21MC 102/103 (AKH) docket to defense liaison in advance of the compliance date.

The Court has also, directed that we bring current the uploading of our discovery responses and medical records to Merrill/Lextranet and Medquest respectively.

We are pleased to advise that we have sent to Medquest supplemental CD's containing all of our available medical records on all of our clients in the 21MC 102/103 (AKH) docket.

With reference to the Discovery Responses, a large number of our clients responses had already been uploaded to the Merrill /Lextranet system for some time already. We are also pleased to advise that we have sent to Merrill/Lextranet a number of discovery responses for additional clients.

However, we are facing a time problem with reference to the remaining clients. Our resources are currently focused on meeting with our clients and preparing the Claim Forms with supporting documents for submission to the Garretson Firm in accordance with the Settlement Plan. We are also engaged in re-pleading a large number of complaints dismissed by the Court.

Additionally as the Court is aware, the recent passage of the Zadroga bill may impact significantly on our 21MC102/102 (AKH) clients, and the manner in which we proceed with the litigation.

It is our intention, of course, to provide the additional discovery responses on a rolling basis, **however we seek relief from the current Court's directive to allow for additional time for the remaining clients. We request therefore a 45 day extension until February 28, 2011 for compliance with this one item of the Courts directive, all other items already accomplished.** (All exchanges referenced herein are being sent this date by overnight express).

We have provided defense liaison with advance notice of this request and they are being copied with this communication. It is our understanding that they are taking no position on the substance of this application.

Yours truly

____s/_____
Gregory Cannata

____s/_____
Robert Grochow

cc: Richard Leff, esq.
Lee Ann Stevenson, esq.